Office of the City Auditor

Performance Audit of SDPD's Data Analysis

Presentation to the City Council
September 13, 2021

Independent • Objective • Accurate

The City of
SAN DIEGO

Background: SDPD is the City's Largest General Fund Department

- SDPD accounts for one-third of General Fund expenditures and employees.

- However, SDPD has fewer officers per resident than other major cities.

- Complete and accurate data is essential for SDPD to inform the public of the City's safety, enable oversight of operations, and allow SDPD to analyze and evaluate operations to enable evidence-based operational decision making.

Background: SDPD is Required to Collect and Report a Variety of Data

- Crime Data
  - California Department of Justice requires submission of certain data on crimes and clearances.
  - The FBI sets standard crime and clearance reporting guidelines through the Uniform Crime Reporting program.

- RIPA Data
  - 2015 Racial and Identity Profiling Act requires submission of data on all stops and searches.

- Complaints Against Officers Data
  - California law requires departments have a process for complaints against officers.
  - California law requires submitting data to California Department of Justice.
  - 2015 Racial and Identity Profiling Act requires the Department of Justice publish complaints data by agency.

Finding 1: SDPD has internal controls that should help ensure reliable crime data and RIPA reports for all stops, but minor inconsistencies could affect future reporting requirements and RIPA completeness.

Crime reporting process

Victim or witness calls Police dispatch to report a crime.

An officer meets with the victim or witness to gather information and evidence to file a crime report according to department procedure.

Officer enters information according to procedure into NetRMS either in the field or at the station. NetRMS performs validation checks for completeness.

Sergeant reviews the crime report according to procedure to ensure completeness and accuracy.

Reports are uploaded to ARJIS, which conducts additional validation checks.

The Crime Analysis Unit retrieves data from ARJIS to conduct analysis, generate reports for Command, and report to DoJ.

Source: OCA generated from interviews and systems documentation.

Finding 1: Crimes and Clearances Data

- SDPD has internal controls that should ensure crimes and clearances data is complete in accordance with reporting standards, including:

    - Supervisory review

    - System data validations

    - External data validation

- Due to a recent change to a new crime report system and SDPD's transition to a new reporting standard, there is a risk some reports may not include all offenses in reportable fields.

    - This does not affect SDPD's ability to investigate crimes, because all details would still be reported in the narrative fields.

Finding 1: RIPA Stop Data

- SDPD has internal controls that should ensure RIPA stop data is collected for all stops, including supervisory audits.

- Due to conflicting guidance in SDPD's FAQ, there is a risk some reports may not include all outcomes of stop as required.
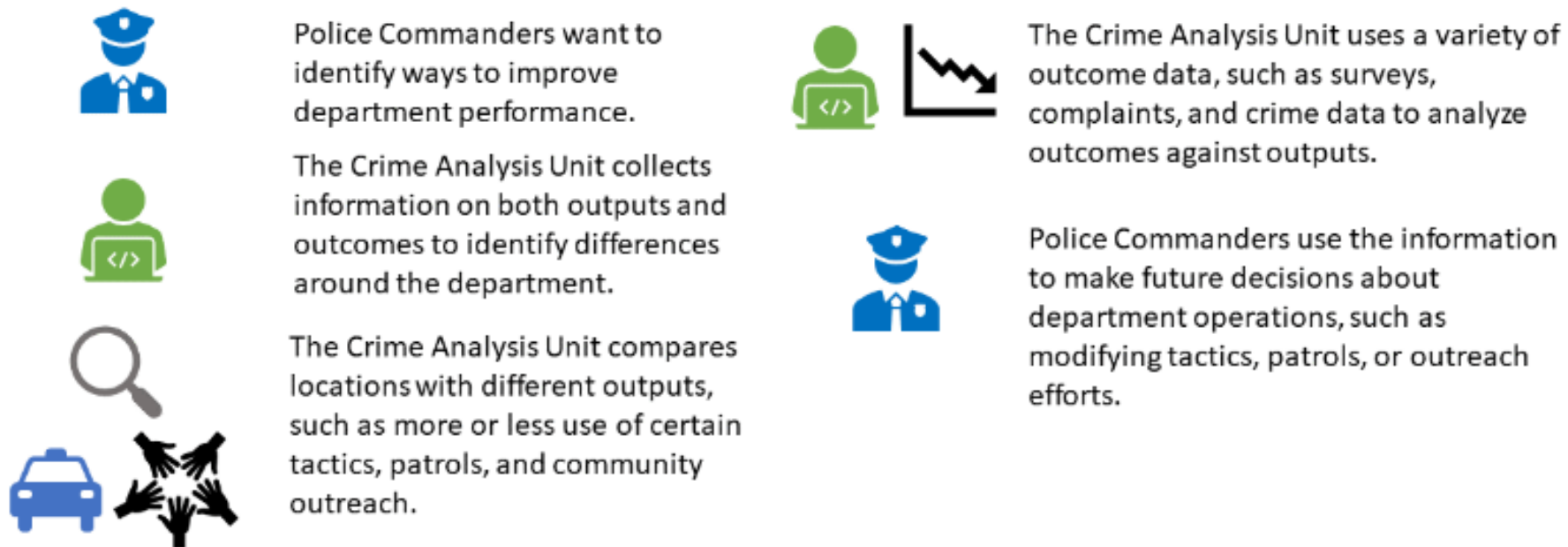

SDPD's RIPA Stop Data Web Application

Finding 1 Recommendations

We made recommendations to:

- Have an independent third-party, such as the FBI, validate the data reliability of SDPD's crime report systems.

- Update crime report procedures and training materials to help ensure reporting consistency.

- Update the RIPA FAQ documentation to specify that the "outcome of stop" data field should include all stop outcomes.

Finding 2: SDPD can improve its use of existing data to evaluate its operations and maximize evidence-based decision making.

Evidence Based Policing Hypothetical Example

Police Commanders want to identify ways to improve department performance.

The Crime Analysis Unit collects information on both outputs and outcomes to identify differences around the department.

The Crime Analysis Unit compares locations with different outputs, such as more or less use of certain tactics, patrols, and community outreach.

The Crime Analysis Unit uses a variety of outcome data, such as surveys, complaints, and crime data to analyze outcomes against outputs.

Police Commanders use the information to make future decisions about department operations, such as modifying tactics, patrols, or outreach efforts.

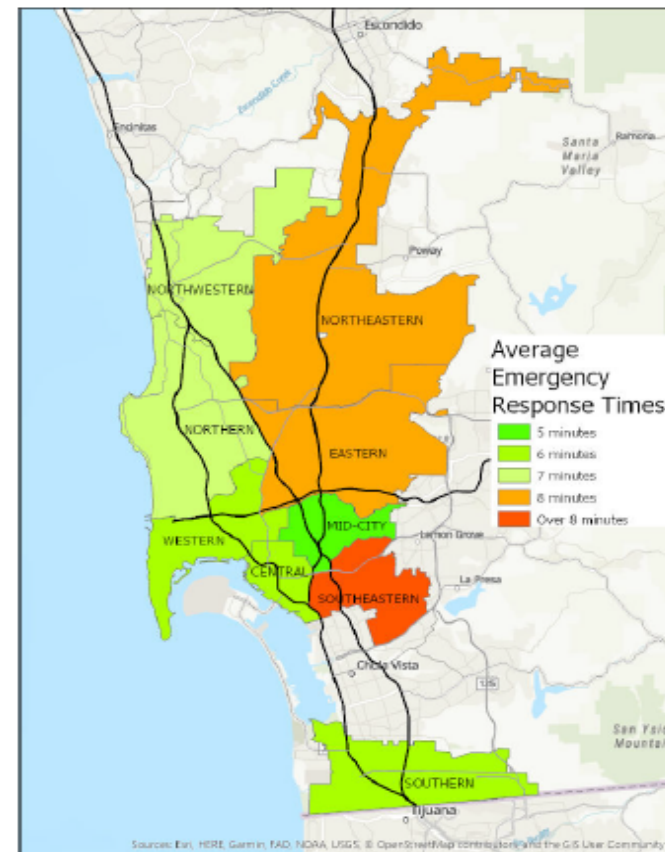Source: OCA generated from evidence-based policing principles.

Finding 2: SDPD can better use data for evaluation and evidence-based operational decisions.

- Officers and sergeants reported using data for tactical purposes.

- Commanders reported using data primarily for tactical purposes.

- SDPD commanders receive counts and rates data for Part 1 crimes, and they report on division efforts to reduce Part 1 crimes during semi-annual meetings.

- Commanders can use data to evaluate the outcomes of division activities, such as community policing efforts or response times.

- Doing so can help SDPD maximize the efficiency, effectiveness, and equity of its operations.

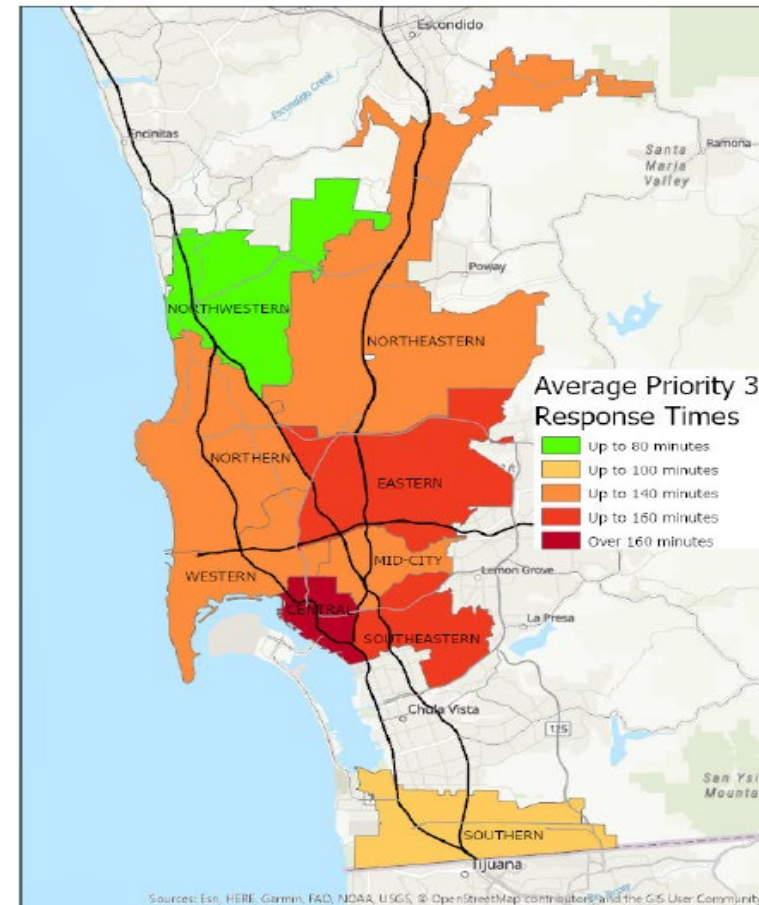# Finding 2: SDPD could benefit from additional data analysis.

- For example, we conducted a division level analysis of some categories of response times:

  - Although SDPD meets its 7-minute target for emergency Part 1 crime calls, this performance varied by division.

Emergency Response Times for Part 1 Crime Related Calls Varied Across the City During FY2016–FY2018 (Goal Time: 7 minutes)

Finding 2: SDPD could benefit from additional data analysis.

- Priority 3 Part 1 crime response times also varied by division.

- Only one division met its 80-minute target for Priority 3 Part 1 crime calls.

- Some other divisions were over double this response time.

Lower Priority Part 1 Crime Related Calls Had Lengthy Response Times in Some Parts of the City (Goal Time: 80 minutes)

Average Priority 3 Response Times
- Up to 80 minutes
- Up to 100 minutes
- Up to 140 minutes
- Up to 160 minutes
- Over 160 minutes

Finding 2 Recommendations

We made recommendations to:

- Formally document a requirement for Commanders to include data analysis in planning and evaluation of Division operations, such as analysis of response times, call outcomes, and community-oriented policing efforts.

- Document a process for the Crime Analysis Unit to conduct outreach with Patrol and Neighborhood Policing Commanders to determine data analysis needed to evaluate operations.

- Establish procedures to survey officers and Commanders annually for information needed to effectively evaluate and manage their operations.

Finding 3: SDPD complies with state law by having a complaint procedure, but procedures can be improved for accepting complaints against officers and informing the public of its complaints process.

- State law requires complaint procedures to be in place for individuals who wish to file a complaint against an Officer. SDPD complies with State law and accepts complaints using the following methods:

  - In Person;

  - Phone;

  - Online;

  - Mail or Email; and

  - Other methods that may occur.

Finding 3: However, SDPD may inadvertently discourage complaints by requiring identifying information without informing the complainant of options to file anonymously.

Instructions for Completing the Complaint Form

Please describe the incident that led to this complaint, telling what happened from beginning to end. Be as clear and specific as you can be. What aspect(s) of the incident was improper (your specific complaint). How could it be resolved to your satisfaction?

Fields with an asterisk (*) are required.

Complainant

First Name *

Last Name *

Age

Email *

Home Phone

Business Phone

Address *

City *

State *

- Select -

Zip Code *

- The complaint form included instructions requiring identifying information

- SDPD's procedure of having Sergeants respond immediately is a best practice that allows immediate investigation and correction of potential misconduct, but does not provide an options for an anonymous complaint.

Finding 3: Physical Complaint Forms Should be Kept in Vehicles

- Best practices recommend that complaint forms be kept in vehicles
  - SDPD's procedure of requiring department members immediately contact a supervisor to interview the complainant and record the complaint has advantages
  - Keeping forms in vehicles as well would allow potential complaints where an individual is unwilling to make the complaint in person


SDPD Police Vehicle

Online Forms Should Clearly Outline Complaint Requirements

- Online forms should inform the complainant of the minimum required information, as well as the benefits of including additional identifying information.

Finding 3: Changes to improve SDPD's complaints procedure increase inherent risk.

- SDPD has improved its complaint procedures:
  - In response to recommendations from the Police Executive Research Forum; and
  - To utilize electronic reporting capabilities of Blue Team.

- There is an inherent risk that officers and sergeants may not follow current procedure.

- A series of changes increases this risk.

- Auditors observed a sergeant resolving a complaint according to outdated procedures.
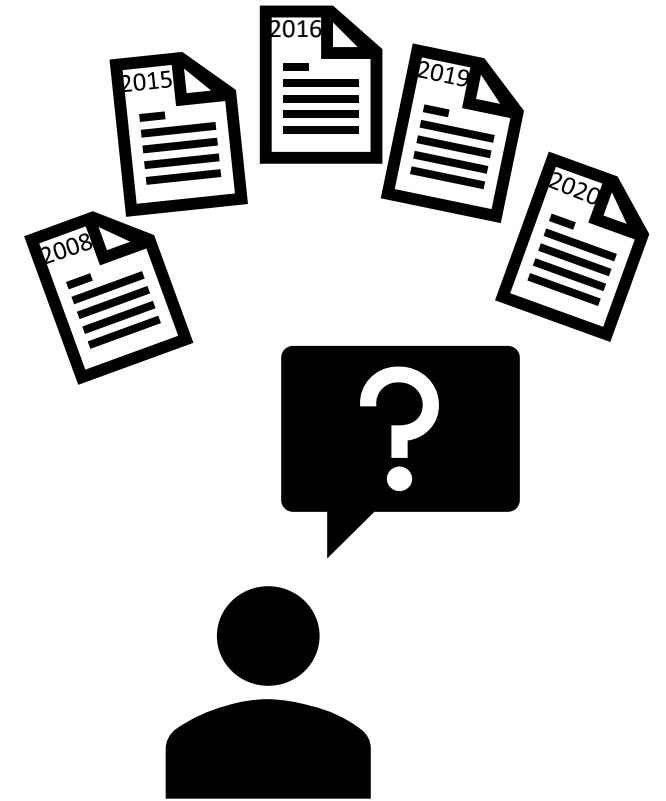
Finding 3: CRB Oversight Role*

One of the roles of the Community Review Board (CRB) includes reviewing and evaluating complaints brought by individuals against Officers.

- Complaints containing Category 1 and 2 allegations are investigated by IA and are reviewed by the CRB.

- SDPD investigates complaints and assumes responsibility to support the CRB review process.

- The CRB reviews the Investigator's Report and conducts its review.

- The CRB only has access to completed investigations and they cannot independently verify the completeness of complaints nor verify if intake procedures are followed.

- The CRB should be able to independently verify completeness of allegations to facilitate their Charter role.

*The Community Review Board has been replaced and superseded by the Commission on Police Practices.

Finding 3 Recommendations

We made recommendations to:

- Formally establish appropriate reporting review access to the Community Review Board on Police Practices to review all formal and documented informal complaints.*

- Develop procedures for officers to inform a complainant of alternative methods of making complaints such as the Community Review Board on Police Practices (CRB) website, City website, or CRB hotline to file complaints.

- Work with all organizations that accept complaints to ensure that the complaint forms and other public information clarify the requirements for filing a complaint.

Conclusion: SDPD can improve its use of data analysis and citizen complaint procedures.

- We made a total of 9 recommendations.

- SDPD agreed to implement all 9 of them.

- SDPD has implemented 3 recommendations to date.